

Randall S. Cavanaugh
KALAMARIDES & LAMBERT
711 H Street, Suite 450
Anchorage, AK 9951
P: (907) 276-2135
F: (907- 278-8514
E: randall@kalamarides.com

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	
)	Case No. 3:03-cr-00088-RRB-4
Plaintiff,)	
)	
v.)	PROPOSAL FOR
)	RELEASE: FUNERAL
IRIS BINGHAM,)	
)	
Defendant.)	
_____)	

COMES NOW the Defendant, Iris Bingham, by and through her attorney, Randall S. Cavanaugh of KALAMARIDES & LAMBERT, and hereby provides the following information for the court to consider for the hearing scheduled for May 18, 2006 at 9:15 a.m.

After court, I spoke to Patricia Bingham, the defendant's mother. She is going to pay for the ticket for Iris to travel to for the funeral to Utah and back to Alaska. Her phone number is 907-723-1244. Currently, she is in North Carolina and most of the

family has already reached Utah for the funeral. Ms. Patricia Bingham is scheduled to travel tomorrow to Utah, but we should be able to reach her.

Patricia Bingham will be third-party custodian and pick Iris Bingham up at the airport in Utah. She will make sure that Iris will be in her sight and sound. She will ensure that Iris does not break the law or consume alcohol. Ms. Patricia Bingham stated that the family does not consume alcohol. Iris and her mother would reside with Danielle Bingham-Johnsen (Iris's sister)(1-801-292-0219). Patricia Bingham stated she would make sure that Iris got back on the plane and returned to Alaska. It is the family's intent to return to Alaska on Monday. There is a chance, pending on ticket availability, that Iris would be with her mother as far as Juneau, Alaska.

I have read the charges to Patricia Bingham. She understands her duty and would have no problem turning in Iris if there was a violation. Patricia Bingham does not believe her daughter to be a flight risk. Her daughter's son would still be in Anchorage, Alaska.

DATED this 18th day of May, 2006, at Anchorage, Alaska.

KALAMARIDES & LAMBERT
Attorneys for Defendant

By: /s/ Randall S. Cavanaugh
Randall S. Cavanaugh, ABA #8812215
KALAMARIDES & LAMBERT
711 H Street, Suite 450
Anchorage, AK 9951
P: (907) 276-2135
F: (907) 278-8514
E: randall@kalamarides.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies, pursuant to App. R. 513.5, that the font used in the aforementioned documents was Times New Roman 13 point. I further certify that a true and correct copy of the foregoing was served via **electronic mail** this 18th day of May, 2006, on:

Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West 7th Avenue, #9, Room 253
Anchorage, AK 99513

/s/ Randall S. Cavanaugh
Kalamarides & Lambert